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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE TFT-LCD (FLAT PANEL) ANTITRUST
LITIGATION

CASE NO. 3:07-md-1827 SI

THIS DOCUMENT RELATES TO:

MDL No. 1827

AT&T Mobility LLC, et al. v. AU Optronics
Corporation, et al., C 09-4997 SI

**STIPULATION AND [PROPOSED]
ORDER MODIFYING FACT
DISCOVERY CUTOFF DATE FOR
INTERROGATORY RESPONSES
AND DEPOSITIONS AND
PRODUCTION OF CUSTODIAL
DOCUMENTS OF DAVID
CHRISTOPHER, MARC LEFAR, AND
PETE RITCHER**

1 Plaintiffs AT&T Mobility LLC, et al., and Samsung Electronics Co., Ltd., Samsung
2 Electronics America, Inc., and Samsung Semiconductor, Inc. (collectively, "Parties") hereby
3 stipulate as follows:

4 **STIPULATION**

5 WHEREAS discovery closes in this case on December 8, 2011 ("Discovery Cutoff"), as
6 set forth in the Stipulation and Order Modifying Pretrial Schedule for "Track One" Direct
7 Action Plaintiff and Actions (Dkt. No. 3110, the "Scheduling Order");

8 WHEREAS the Parties have conferred regarding the schedule set forth in the Scheduling
9 Order and the availability of Messrs. David Christopher, Marc Lefar, and Pete Ritcher in
10 advance of the Discovery Cutoff;

11 WHEREAS the Parties have conferred regarding the production of custodial documents
12 from the files of Messrs. Christopher, Lefar, and Ritcher;

13 WHEREAS the Parties have agreed that Messrs. Christopher and Lefar will not be
14 available for deposition prior to the Discovery Cutoff, but will be available for deposition up to
15 January 20, 2012 (the "Revised Cutoff");

16 WHEREAS the Parties continue to confer regarding whether Mr. Ritcher will appear for
17 deposition prior to the Revised Cutoff;

18 WHEREAS the Parties have agreed that Mr. Christopher's custodial documents will be
19 produced in advance of his deposition;

20 WHEREAS the Parties continue to confer regarding the production of custodial
21 documents from the files of Messrs. Lefar and Ritcher;

22 WHEREAS Samsung has served interrogatories on AT&T, AT&T has responded, and
23 the Parties are engaging in a meet and confer process regarding supplementation of AT&T's
24 responses;

25 WHEREAS the Parties agree to the extension of the close of fact discovery set forth in
26 the Scheduling Order for the limited purpose of allowing sufficient time to complete the
27 discovery referenced above;

1 NOW, THEREFORE, the Parties, through their undersigned respective counsel, stipulate
2 and agree as follows:

3 The Discovery Cutoff in the above-captioned matter, as set forth in the Scheduling
4 Order, is extended to January 20, 2012 solely as to (a) the depositions of Messrs. Christopher
5 and Lefar; (b) the production of custodial documents of Mr. Christopher; (c) the meet and
6 confer process regarding (i) whether Mr. Ritcher will appear for deposition, and (ii) the
7 production of custodial documents for Mr. Ritcher and Mr. Lefar; and (d) the meet and confer
8 process and supplementation regarding Samsung's interrogatories to AT&T.

9
10 December 7, 2011

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**Pursuant to General Order 45, Part X-B, the filer attests that concurrence in the
filing of this document has been obtained from the other signatories.**

IT IS SO ORDERED.

Dated Entered: 12/12/11


The Honorable Susan Illston
District Court Judge